

## REMARKS

### Prior art rejections

Claims 1-8 and 19-22 have been rejected under 35 USC 103(a) as being unpatentable over Kane (6,112,014) in view of Casey (6,452,695). Claims 9-18 and 24-25 have been rejected under 35 USC 103(a) as being unpatentable over Yoshiura (5,854,693) in view of Casey. Claims 1, 9, 19, and 24 are independent claims, from which the remaining pending claims ultimately depend. Applicant submits that independent claims 1, 9, 19, and 24, at least as amended, are patentable over Kane or Yoshiura in view of Casey, such that the remaining claims are patentable at least because they depend from patentable independent base claims.

In the previous office action response, Applicant amended the claims so that the image data in question is “preformatted for the at least one external output device.” Applicant has further clarified this limitation in the present amendments. For instance, in exemplary relation to claim 1, “the image data *as received from the peripheral device* [is] preformatted for the at least one external output device, *instead of the image data having to be formatted by the controller for the at least one external output device after the controller receives the image data from the peripheral device.*” For example, in paragraph [0019] of the patent application as filed, the “image data received from the peripheral device 60 may be preformatted for the . . . external output device 50, 52” and “[a]lternatively, the image data received from the peripheral device 60 may be formatted by the controller 30 into the output data stream 32.” Thus, Applicant has amended the claimed invention to particularly recite the former scenario and to particularly exclude the latter scenario.

Applicant submits that the claimed invention at least as amended in this respect is patentable over Kane or Yoshiura in view of Casey. The Examiner has particularly relied upon Casey as teaching the limitations of the claimed invention as recited in the previous paragraph, and therefore Applicant does likewise. It is noted that Applicant is *not* attacking a single prior art reference (Casey) in countering a rejection made over a combination of references under

35 USC 103(a). *Rather*, Applicant is attacking *the combination of references* as a whole under 35 USC 103(a), by specifically contending that insofar as one of these references (Casey) does not teach, disclose, or suggest the limitation for which it is being relied upon, then any combination of references that includes Casey cannot be considered as teaching, disclosing, or suggesting all the limitations of the invention.

Casey discloses an adapter device 100 that “effectively ‘pulls’ image data from the image input device 300 to be printed by the printer 200.” (Col. 2, ll. 65-67.) In particular, it achieves this by the device’s processor “process[ing] image data from the image input device under control of the printer driver software for generating printer data to be printed by the printer.” (Col. 2, ll. 20-23.) The printer driver software is installed within the adapter device. (Col. 3, ll. 3-12.) The adapter device 100 has “[m]emory 130 . . . for buffering image data output by the image input device 300 prior to it being processed and forwarded to the printer 200.” (Col. 3, ll. 22-27.) The adapter device 100 thus includes “input device driver software [that] includes the various instructions required to . . . receive the image data generated by the image input device 300.” (Col. 4, ll. 10-13.) By comparison, the device’s “printer driver software includes the various instructions necessary to supply printer data to the printer 100.” (Col. 4, ll. 134-16.) Thus, the adapter device’s “memory 130 buffers (temporarily stores) the image data that is received from the image input device 300 to enable the generation of corresponding printer data under control of the printer driver software” of the adapter device 100. (Col. 4, ll. 22-26.)

Therefore, Kane or Yoshiura in view of Casey discloses that Casey’s adapter device 100 receives image data from the image input device 300, and processes this image data to generate corresponding printer data that the controller sends to the printer 200. This can be clearly seen in FIG. 1 of Casey as well. The adapter device 100 receives image data from the image input device 300, which is processed to yield corresponding printer data that is sent to the printer 200 for printing.

Now, compare the claimed invention. In the claimed invention, the image data as received from the peripheral device (i.e., Casey's image input device 300) is already *preformatted* for the at least one external output device (i.e., Casey's printer 200), instead of the image data having to be formatted by the controller (i.e., that of Casey's adapter device 100) for the at least one external output device after the controller receives the image data from the peripheral device. The claimed invention thus claims the exact opposite of what occurs in Kane or Yoshiura in view of Casey.

That is, Kane or Yoshiura in view of Casey teaches that an adapter device/controller/et cetera receives image data from a peripheral device, *and then formats this image data for the at least one external output device*. This is because Kane or Yoshiura in view of Casey teaches that corresponding printer data is generated from the image data received from the peripheral device, and it is this corresponding printer data that is sent to the at least one external output device. The image data in Kane or Yoshiura in view of Casey is not *preformatted* for the at least one external output device. Rather, the image data in Kane or Yoshiura in view of Casey has to be formatted by the adapter device/controller/et cetera after the adapter device/controller/et cetera receives the image data from the peripheral device. Stated another way, it is not the image data received from the peripheral device that is sent to the at least one external output device in Kane or Yoshiura in view of Casey, because this image data is not preformatted for the at least one external output device. Rather, it is the corresponding printer data generated by the adapter device/controller/et cetera from the received image data that is sent to the at least one external output device for printing.

Therefore, Kane or Yoshiura in view of Casey does not teach the claimed invention's image data as received from the peripheral device being preformatted for the at least one external output device, instead of the image data having to be formatted by the adapter device/controller/et cetera for the at least one external output device after the adapter device/controller/ et cetera receives the image data from the peripheral device. Kane or Yoshiura in view of Casey does not teach receiving *preformatted* image data. Rather, Kane or Yoshiura in view of Casey teaches that

the image data that is received has to be *formatted* after receipt, by generating corresponding printer data for the at least one external output device. Insofar as Kane or Yoshiura in view of Casey does not teach, disclose or suggest all the limitations of the invention, the claimed invention is patentable over Kane or Yoshiura in view of Casey.

Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Mike Dryja, Applicants' Attorney, at 425-427-5094, so that such issues may be resolved as expeditiously as possible. For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,



Michael A. Dryja, Reg. No. 39,662  
Attorney/Agent for Applicant(s)

December 18, 2007  
Date

Law Offices of Michael Dryja  
1474 N Cooper Rd #105-248  
Gilbert, AZ 85233  
tel: 425-427-5094  
fax: 206-374-2819